

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re:  
LECLAIRRYAN PLLC,  
  
Debtor.

Chapter 11

Case No. 19-34574 (KRH)

**NOTICE OF MOTION AND NOTICE OF HEARING ON MOTION  
FOR LIMITED RELIEF FROM THE AUTOMATIC STAY**

**PLEASE TAKE NOTICE THAT** R.F. Technologies, Inc. (“RFT”) and Robert Noorian (“Noorian”; together with RFT, the “Plaintiffs”) have filed with the Court their *Motion for Limited Relief from the Automatic Stay* (the “Motion”).

**PLEASE TAKE FURTHER NOTICE THAT your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

**PLEASE TAKE FURTHER NOTICE THAT** an *Order Establishing Certain Notice, Case Management and Administrative Procedures* [Docket No. 38] (the “Case Management Order”) was entered by the Court on September 4, 2019, which, among other things, prescribes the manner in which objections must be filed and served and when hearings will be conducted. A copy of the Case Management Order may be obtained for a fee via PACER at <http://www.vaeb.uscourts.gov>.

**PLEASE TAKE FURTHER NOTICE THAT** if you do not timely file and serve a written objection to the relief requested in the Motion, the Court may deem any opposition waived, treat the Motion as conceded and enter an order granting the relief requested in the Motion without further notice or a hearing.

**PLEASE TAKE FURTHER NOTICE THAT** if a party wishes to oppose the Motion, then such opposition must be filed no later than **December 12, 2019** (the “Objection Deadline”), by filing with the Court, at the address shown below, a written objection pursuant to Local Bankruptcy Rule 9013-1 and the Case Management Order:

Clerk of the Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, Virginia 23219

**PLEASE TAKE FURTHER NOTICE THAT** in accordance with the Case Management Order, you also must serve a copy of your written objection on the Core Group, the 2002 List and the Affected Entities, as such terms are defined in the Case Management Order.

**PLEASE TAKE FURTHER NOTICE THAT** a hearing to consider the Motion will occur on **December 19, 2019 at 1:00 p.m.** prevailing Eastern Time. If you timely file a written response but fail to attend the hearing the Court may consider any objection you may have waived and enter an order granting the relief requested.

Dated: November 21, 2019

Respectfully submitted,

**R.F. TECHNOLOGIES, INC. and  
ROBERT NOORIAN**

/s/ Michael Wilson

Michael G. Wilson (VSB #48927)

**Michael Wilson PLC**

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*Counsel to the Plaintiffs*